Bruce Korenstra
Better Way Products Inc.
70891 C.R.23
New Paris IN 46553

Re: 039-12115
First Administrative Amendment to
Part 70 039-7106-00141

Dear Bruce Korenstra:

Better Way Products Inc. was issued a Part 70 Operating Permit on December 30, 1999 for operation of fiberglass lamination production. A letter requesting combining Construction Permit 039-8708-00141 for Plant 2 with this permit and other administrative changes was received on March 31, 2000. Pursuant to the provisions of 2-7-11 the Part 70 permit T039-7106-00141 is hereby administratively amended with changes marked in bold and strikeout as follows:

1. Better Way Products Inc. was issued a Construction Permit 039-8708-00141 on March 5, 1998. In this permit, condition 6 (e) stated that the Permittee has submitted their Part 70 (T039-7106-00141) application on November 7, 1996 for their existing source. The equipment being reviewed under this permit (Construction Permit) shall be incorporated in the submitted Part 70 application. This equipment was not incorporated in the Part 70 permit. The Permittee requests that this equipment be added to their Part 70 Permit. The Permittee wishes to continue to limit VOC emission to 250 tons per year to avoid PSD requirements.

   Section A.2 is amended as follows:

   A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

   This stationary source consists of the following emission units and pollution control devices:

   (a) Gelcoat booth, identified as 0243, with a maximum capacity of 143.6 pounds per hour, using dry filters as control, and exhausting to stack E-1.
   (b) Resin chop area, identified as 3069, with a maximum capacity of 322.1 pounds per hour, using dry filters as control, and exhausting to stack E-2.
   (c) Resin chop area, identified as 4779, with a maximum capacity of 322.1 pounds per hour, using dry filters as control, and exhausting to stack E-3.
   (d) Grinding area, identified as 0778, with a maximum capacity of 720.0 pounds per hour, using dry filters as control, and exhausting to stack D-1 & 2.
   (e) One (1) gelcoat booth, known as E-1, equipped with an air-assisted airless spray applicator, equipped with dry filters for overspray control, equipped with a 22,800 cubic feet per minute exhaust fan, capacity: 7.5 fiberglass parts per hour.

(f) One (1) resin booth, known as E-2, equipped with air-assisted airless spray applicators, equipped with dry filters for overspray control, equipped with a 22,800 cubic feet per minute exhaust fan, capacity: 7.5 fiberglass parts per hour.

(g) One (1) grinding area, equipped with two (2) hand grinders, known as D-1 and D-2, each equipped with a vacuum system and cartridge dust collector for particulate matter control, each equipped with a 10,000 cubic feet per minute exhaust fan, capacity: 7.5 fiberglass parts per hour.

(h) Four (4) natural gas-fired infrared space heaters, capacity: 0.125 million British thermal units per hour, each.

(i) Four (4) natural gas-fired radiant space heaters, capacity: 0.150 million British thermal units per hour, each.

(j) One (1) natural gas-fired air make-up unit, capacity: 4.1 million British thermal units per hour.

(k) Two (2) natural gas-fired office furnaces, capacity: 0.100 million British thermal units per hour, each.

A new Section D.2 is added to the permit as follows:

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(e) One (1) gelcoat booth, known as E-1, equipped with an air-assisted airless spray applicator, equipped with dry filters for overspray control, equipped with a 22,800 cubic feet per minute exhaust fan, capacity: 7.5 fiberglass parts per hour.

(f) One (1) resin booth, known as E-2, equipped with air-assisted airless spray applicators, equipped with dry filters for overspray control, equipped with a 22,800 cubic feet per minute exhaust fan, capacity: 7.5 fiberglass parts per hour.

(g) One (1) grinding area, equipped with two (2) hand grinders, known as D-1 and D-2, each equipped with a vacuum system and cartridge dust collector for particulate matter control, each equipped with a 10,000 cubic feet per minute exhaust fan, capacity: 7.5 fiberglass parts per hour.

(h) Four (4) natural gas-fired infrared space heaters, capacity: 0.125 million British thermal units per hour, each.

(i) Four (4) natural gas-fired radiant space heaters, capacity: 0.150 million British thermal units per hour, each.

(j) One (1) natural gas-fired air make-up unit, capacity: 4.1 million British thermal units per hour.

(k) Two (2) natural gas-fired office furnaces, capacity: 0.100 million British thermal units per hour, each.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

(a) This source shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per year. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per 12

consecutive month period, based on a rolling total. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.2.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

(a) That the emissions of volatile organic compounds (VOC), including cleanup solvents, shall be limited to 228 tons per year, rolled on a monthly basis. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply. VOC emissions shall be calculated from VOC applied to the applicators, using the following method:

$$VOC = \sum_{n=1}^{n\ \text{materials}} \text{density of material} \times \text{gallons/unit} \times \text{weight percent volatile} \times \text{flashoff factor} \times \text{units/hour}$$

(b) A flashoff factor of 0.35 should be used for all gelcoats and 0.13 for all resins. All other materials have a flashoff factor equal to 1.00.

(c) During the first 12 months of operation, the input raw material usage shall be limited such that the total emissions divided by the accumulated months of operation shall not exceed the limit specified.

D.2.3 Particulate Matter (PM) Limitation [326 IAC 6-3]

That pursuant to 326 IAC 6-3 (Process Operations), the vacuum system and cartridge dust collectors shall be in operation at all times when grinding is being performed, and shall not exceed the allowable particulate matter (PM) emission rate of 2.17 pounds per hour. This limitation will also make 326 IAC 2-2 not applicable.

D.2.4 Dust Collector Operating Condition

That the dust collectors shall be operated at all times when the grinding process is in operation.

(a) An inspection shall be performed each calendar quarter of the all the dust collectors. Defective dust collectors shall be replaced. A record shall be kept of the results of the inspection and the number of dust collectors replaced.

(b) In the event that a dust collector's failure has been observed:

(i) The affected compartments will be shut down immediately until the failed units have been replaced.

(ii) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

D.2.5 Visible Emission Notations

That visible emission notations of all exhausts to the atmosphere from vacuum systems and cartridges shall be performed once per day. A trained employee will record whether emissions are normal or abnormal.

(a) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, 80 percent of the time the process is in operation, not counting start up or shut down time.

(b) In the case of batch or discontinuous operation, readings shall be taken during that part of the operation specified in the facility's specific condition prescribing visible emissions.

(c) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal and abnormal visible emissions for that specific process.

(d) The Preventive Maintenance Plan for this facility shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

D.2.6 Process Operations [326 IAC 6-3]

Pursuant to 326 IAC 6-3:

(a) The dry filters for particulate matter overspray control shall be in operation at all times when the resin and gelcoat booths are in operation.

(b) The resin and gelcoat booth operations shall comply with 326 IAC 6-3-2(c) using the following equation:

If P is equal to or less than 60,000 pounds per hour (30 tons per hour):

$E = 4.10P^{0.67}$ where: E = rate of emission in pounds per hour,
P = process weight in tons per hour.

and not exceed the allowable PM emission rate of 6.08 and 3.55 pounds per hour for the resin and gelcoat booths, respectively.

(c) Daily inspections shall be performed to verify the placement, integrity and particulate loading of the filters.

(d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.2.7 BACT/MACT Condition [326 IAC 8-1-6] [326 IAC 2-1-3.4]

(a) That pursuant to 326 IAC 8-1-6 and 326 IAC 2-1-3.4, the as-installed the air assisted airless spray applicators shall be used at all times during resin and gelcoat fiberglass products spraying operations and subject to the VOC emission limitation contained in Condition D.2.2. BACT/MACT was determined to be the as installed air-assisted airless spray applicators with a VOC limit of 228 tons per rolling 12-month period, a maximum styrene content of the resins used of 60.0 percent by weight and the following workplace standards:

(i) All resins and gelcoats will be applied with air-assisted airless spray applicators.

(ii) Spray applicators will be cleaned with acetone.

(iii) The cleanup solvent containers used to transport solvent other than acetone from drums to work stations be closed containers having soft gasketed spring-loaded closures.

(iv) Cleanup rags saturated with solvent other than acetone shall be stored, transported, and disposed of in containers that are closed tightly.

(v) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent other than acetone into the air.

(vi) The overspray shall be minimized by spraying as close as practical into the molds.

(vii) The application equipment operators shall be instructed and trained on the methods and practices utilized to minimize the overspray emitted on the floor and into the air filters.

(viii) All solvent other than acetone sprayed during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(ix) Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.

(b) Air-assisted airless spray means technology used to apply coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.2.8 Reporting Requirements

That a log of information necessary to document compliance with Condition no. D.2.2 shall be maintained. These records shall be kept for at least the past 36-month period and made available upon request to the Office of Air Management (OAM).

(a) A quarterly summary shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
within 30 days after the end of the quarter being reported in the format attached. These records shall include the coating, thinner and clean up solvent usage, material safety data sheet (MSDS) and the date of use.

(b) Unless otherwise specified in this permit, any notice, report, or other submissions required by this permit shall be timely if:

(i) Delivered by U.S. mail and postmarked on or before the date it is due; or

(ii) Delivered by any other method if it is received and stamped by IDEM, OAM on or before the date it is due.

(c) All instances of deviations from any requirements of this permit must be clearly identified in such reports.

(d) Any corrective actions taken as a result of an exceedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions must be clearly identified in such reports.

(e) The first report shall cover the period commencing the postmarked submission date of the Affidavit of Construction.

2. The address of the facility is 70891 County Road 23 not 71913 County Road 23. The city, state and Zip are correct.

Section A.1, Certification form, Emergency/Deviation Occurrence Report Form, Quarterly Report Form and Quarterly Compliance Monitoring Report Form are amended as follows:

Source Location: ~~71913~~ **70891** C. R. 23, New Paris, IN 46553
Mailing Address: ~~71913~~ **70891** C. R. 23, New Paris, IN 46553

3. Condition D.1.1 should be reworded. It states, "Pursuant to CP 039-8708-00141, issued on March 5, 1998, this source shall use less than 250 tons of VOC. The Permittee has requested to change the word "use" to "emit".

The Office of Air Management (OAM) would rather phrase the limiting conditions in terms of usage, rather than emissions. This is because usage is more readily available to be gauged, while emissions are not necessarily as easy to run a check on. Therefore the concept of usage will remain for this condition.

Upon further review, OAM has determined that the reference to Operation Permit was incorrect in this condition. Hence the same has been deleted as follows:

D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

(a) ~~Pursuant to CP 039-8708-00141, issued on March 5, 1998, t~~ **T**his source shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per ~~year~~ **12 consecutive month period, based on a rolling total**. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

4. Condition D.1.2 (a) ends by "and the following workplace standards:", but does not list standards.

The workplace standards are listed under the BACT requirements D.1.2 (b).

Upon further review, OAM has determined that the reference to Operation Permit was incorrect in condition D.1.2 (a). Hence the same has been deleted as follows:

D.1.2 Volatile Organic Compounds (BACT) [326 IAC 8-1-6]

(a) ~~Pursuant to CP 039-8708-00141, issued on March 5, 1998, t~~ **T**he as-installed air assisted airless spray applicators shall be used at all times during resin and gelcoat fiberglass products spraying operations and subject to the VOC emission limitation contained in ~~operation permit~~ Condition No. ~~8~~ **D.1.1**. BACT/MACT was determined to be the as installed air-assisted airless spray applicators with a VOC limit of 245 tons per rolling 12-month period, a maximum styrene content of the resins used of 60.0 percent by weight and the following workplace standards:

5. Upon further review, OAM has determined that the reference to Operation Permit was incorrect in condition D.1.3. Hence the same has been deleted as follows:

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

a) ~~Pursuant to CP 039-8708-00141, issued on March 5, 1998t~~ **T**he PM from the fiberglass lamination production shall not exceed the pound per hour emission rate established as E in the following formula:

6. Condition D.1.10 (a)(3) should be reworded to state ”The non-acetone clean-up solvent usage for each month”.

As per Addendum to the Technical Support Document for CP 039-8708, it is noted under comment 2 and response 2 that Acetone is non-VOC non-HAP compound. Thus this amendment is made to Condition D.1.10 (a)(3) as follows:

(3) The **non-acetone** cleanup solvent usage for each month;

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Gurinder Saini, at (800) 451-6027, press 0 and ask for Gurinder Saini or extension 3-0203, or dial (317) 233-0203.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
GS
cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector Paul Karkiewicz
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Better Way Products Inc.
70891 C.R. 23
New Paris, Indiana 46553

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-7106-00141	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: December 30, 1999

First Administrative Amendment AA039-12115	Pages Affected: 3, 4, 5, 27, 28, 30, 31-35 Pages Added: 30a-30d
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates

Responsible Official:	Bruce Korenstra
Source Address:	70891 C. R. 23, New Paris, Indiana 46553
Mailing Address:	70891 C. R. 23, New Paris, Indiana 46553
Phone Number:	(219) 831-3340
SIC Code:	3089
County Location:	Elkhart
County Status:	Attainment for all criteria pollutants Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, Section 112 of the Clean Air Act Minor Source, under PSD or Emission Offset Rules;

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) Gelcoat booth, identified as 0243, with a maximum capacity of 143.6 pounds per hour, using dry filters as control, and exhausting to stack E-1.

(b) Resin chop area, identified as 3069, with a maximum capacity of 322.1 pounds per hour, using dry filters as control, and exhausting to stack E-2.

(c) Resin chop area, identified as 4779, with a maximum capacity of 322.1 pounds per hour, using dry filters as control, and exhausting to stack E-3.

(d) Grinding area, identified as 0778, with a maximum capacity of 720.0 pounds per hour, using dry filters as control, and exhausting to stack D-1 & 2.

(e) One (1) gelcoat booth, known as E-1, equipped with an air-assisted airless spray applicator, equipped with dry filters for overspray control, equipped with a 22,800 cubic feet per minute exhaust fan, capacity: 7.5 fiberglass parts per hour.

(f) One (1) resin booth, known as E-2, equipped with air-assisted airless spray applicators, equipped with dry filters for overspray control, equipped with a 22,800 cubic feet per minute exhaust fan, capacity: 7.5 fiberglass parts per hour.

(g) One (1) grinding area, equipped with two (2) hand grinders, known as D-1 and D-2, each equipped with a vacuum system and cartridge dust collector for particulate matter control, each equipped with a 10,000 cubic feet per minute exhaust fan, capacity: 7.5 fiberglass parts per hour.

(h) Four (4) natural gas-fired infrared space heaters, capacity: 0.125 million British thermal units per hour, each.

(i) Four (4) natural gas-fired radiant space heaters, capacity: 0.150 million British thermal units per hour, each.

(j) One (1) natural gas-fired air make-up unit, capacity: 4.1 million British thermal units per hour.

(k) Two (2) natural gas-fired office furnaces, capacity: 0.100 million British thermal units per hour, each.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

(b) Combustion source flame safety purging on startup.

(c) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings. Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(d) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) Gelcoat booth, identified as 0243, utilizing air assisted airless spray guns with a maximum capacity of 143.6 pounds per hour, using dry filters as control, and exhausting to stack E-1.

(b) Resin chop area, identified as 3069, utilizing air assisted airless spray guns with a maximum capacity of 322.1 pounds per hour, using dry filters as control, and exhausting to stack E-2.

(c) Resin chop area, identified as 4779,utilizing air assisted airless spray guns with a maximum capacity of 322.1 pounds per hour, using dry filters as control, and exhausting to stack E-3.

(d) Grinding area, identified as 0778, with a maximum capacity of 720.0 pounds per hour, using dry filters as control, and exhausting to stack D-1 & 2.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

(a) This source shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period, based on a rolling total. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.1.2 Volatile Organic Compounds (BACT) [326 IAC 8-1-6]

. (a) The as-installed air assisted airless spray applicators shall be used at all times during resin and gelcoat fiberglass products spraying operations and subject to the VOC emission limitation contained in Condition No. D.1.1. BACT/MACT was determined to be the as installed air-assisted airless spray applicators with a VOC limit of 245 tons per rolling 12-month period, a maximum styrene content of the resins used of 60.0 percent by weight and the following workplace standards:

(b) Use of resins and gel coats shall be limited such that the potential to emit (PTE) volatile organic chemicals from resins and gel coats only shall be less than 245 tons per twelve (12) consecutive months. Compliance with this limit shall be determined based upon the following criteria:

(1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic chemical emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.

(2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAM: “CFA Emission

Models for the Reinforced Plastics Industries", Composites Fabricators Association, February 28, 1998, or its updates, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

BACT for these facilities shall be satisfied by the requirements specified in part (a) of this condition which shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(1) All resins and gelcoats will be applied with air-assisted airless spray applicators.

(2) Spray applicators will be cleaned with acetone.

(3) The cleanup solvent containers used to transport solvent other than acetone from drums to work stations be closed containers having soft gasketed spring-loaded closures.

(4) Cleanup rags saturated with solvent other than acetone shall be stored, transported, and disposed of in containers that are closed tightly.

(5) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent other than acetone into the air.

(6) The overspray shall be minimized by spraying as close as practical into the molds.

(7) The application equipment operators shall be instructed and trained on the methods and practices utilized to minimize the overspray emitted on the floor and into the air filters.

(8) Storage containers used to store VOC's materials shall be kept covered when not in use.

(c) Air-assisted airless spray means technology used to apply coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

a) The PM from the fiberglass lamination production shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

b) Pursuant to 326 IAC 6-3-2 the PM from the grinding operations, shall not exceed 2.1 pounds per hour when operating at a process weight rate of 720 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D 1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D 1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.8 Particulate Matter (PM)

Pursuant to CP 039-2414, issued on September 24, 1996 the dry filters for PM control shall be in operation at all times when the grinding is in operation.

D.1.9 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (E1, E2, E3) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps

in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The non-acetone cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Better Way Products Inc.
Source Location: 70891 C. R. 23, New Paris, IN 46553
Mailing Address: 70891 C. R. 23, New Paris, IN 46553
Part 70 Permit No. T039-7106-00141

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT

COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Better Way Products Inc.
Source Location: 70891 C. R. 23, New Paris, IN 46553
Mailing Address: 70891 C. R. 23, New Paris, IN 46553
Part 70 Permit No. T039-7106-00141

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(C) C The Permittee must submit notice in writing within ten (**10**) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Better Way Products Inc.
Source Location: 70891 C. R. 23, New Paris, IN 46553
Mailing Address: 70891 C. R. 23, New Paris, IN 46553
Part 70 Permit No. T039-7106-00141
Facility: Fiberglass operations (Resin & Gelcoat)
Parameter: VOC
Limit: Less than 245 tons/year

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC This Month	VOC Previous 11 Months	VOC 12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Better Way Products Inc.
Source Location: 70891 C. R. 23, New Paris, IN 46553
Mailing Address: 70891 C. R. 23, New Paris, IN 46553
Part 70 Permit No. T039-7106-00141

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.4)	**Number of Deviations**	**Date of each Deviation**

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(e) One (1) gelcoat booth, known as E-1, equipped with an air-assisted airless spray applicator, equipped with dry filters for overspray control, equipped with a 22,800 cubic feet per minute exhaust fan, capacity: 7.5 fiberglass parts per hour.
(f) One (1) resin booth, known as E-2, equipped with air-assisted airless spray applicators, equipped with dry filters for overspray control, equipped with a 22,800 cubic feet per minute exhaust fan, capacity: 7.5 fiberglass parts per hour.
(g) One (1) grinding area, equipped with two (2) hand grinders, known as D-1 and D-2, each equipped with a vacuum system and cartridge dust collector for particulate matter control, each equipped with a 10,000 cubic feet per minute exhaust fan, capacity: 7.5 fiberglass parts per hour.
(h) Four (4) natural gas-fired infrared space heaters, capacity: 0.125 million British thermal units per hour, each.
(i) Four (4) natural gas-fired radiant space heaters, capacity: 0.150 million British thermal units per hour, each.
(j) One (1) natural gas-fired air make-up unit, capacity: 4.1 million British thermal units per hour.
(k) Two (2) natural gas-fired office furnaces, capacity: 0.100 million British thermal units per hour, each.
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

(a) This source shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per year. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per 12 consecutive month period, based on a rolling total. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.2.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

(a) That the emissions of volatile organic compounds (VOC), including cleanup solvents, shall be limited to 228 tons per year, rolled on a monthly basis. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply. VOC emissions shall be calculated from VOC applied to the applicators, using the following method:

$$VOC = \sum_{n=1}^{n\ \text{materials}} \text{density of material} \times \text{gallons/unit} \times \text{weight percent volatile} \times \text{flashoff factor} \times \text{units/hour}$$

(b) A flashoff factor of 0.35 should be used for all gelcoats and 0.13 for all resins. All other materials have a flashoff factor equal to 1.00.

(c) During the first 12 months of operation, the input raw material usage shall be limited

such that the total emissions divided by the accumulated months of operation shall not exceed the limit specified.

D.2.3 Particulate Matter (PM) Limitation [326 IAC 6-3]

That pursuant to 326 IAC 6-3 (Process Operations), the vacuum system and cartridge dust collectors shall be in operation at all times when grinding is being performed, and shall not exceed the allowable particulate matter (PM) emission rate of 2.17 pounds per hour. This limitation will also make 326 IAC 2-2 not applicable.

D.2.4 Dust Collector Operating Condition

That the dust collectors shall be operated at all times when the grinding process is in operation.

(a) An inspection shall be performed each calendar quarter of the all the dust collectors. Defective dust collectors shall be replaced. A record shall be kept of the results of the inspection and the number of dust collectors replaced.

(b) In the event that a dust collector's failure has been observed:

(i) The affected compartments will be shut down immediately until the failed units have been replaced.

(ii) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

D.2.5 Visible Emission Notations

That visible emission notations of all exhausts to the atmosphere from vacuum systems and cartridges shall be performed once per day. A trained employee will record whether emissions are normal or abnormal.

(a) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, 80 percent of the time the process is in operation, not counting start up or shut down time.

(b) In the case of batch or discontinuous operation, readings shall be taken during that part of the operation specified in the facility's specific condition prescribing visible emissions.

(c) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal and abnormal visible emissions for that specific process.

(d) The Preventive Maintenance Plan for this facility shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

D.2.6 Process Operations [326 IAC 6-3]

Pursuant to 326 IAC 6-3:

(a) The dry filters for particulate matter overspray control shall be in operation at all times when the resin and gelcoat booths are in operation.

(b) The resin and gelcoat booth operations shall comply with 326 IAC 6-3-2(c) using the following equation:

If P is equal to or less than 60,000 pounds per hour (30 tons per hour):

$E = 4.10P^{0.67}$ where: E = rate of emission in pounds per hour,
P = process weight in tons per hour.

and not exceed the allowable PM emission rate of 6.08 and 3.55 pounds per hour for the resin and gelcoat booths, respectively.

(c) Daily inspections shall be performed to verify the placement, integrity and particulate loading of the filters.

(d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.2.7 BACT/MACT Condition [326 IAC 8-1-6] [326 IAC 2-1-3.4]

(a) That pursuant to 326 IAC 8-1-6 and 326 IAC 2-1-3.4, the as-installed the air assisted airless spray applicators shall be used at all times during resin and gelcoat fiberglass products spraying operations and subject to the VOC emission limitation contained in Condition No. D.2.2. BACT/MACT was determined to be the as installed air-assisted airless spray applicators with a VOC limit of 228 tons per rolling 12-month period, a maximum styrene content of the resins used of 60.0 percent by weight and the following workplace standards:

(i) All resins and gelcoats will be applied with air-assisted airless spray applicators.

(ii) Spray applicators will be cleaned with acetone.

(iii) The cleanup solvent containers used to transport solvent other than acetone from drums to work stations be closed containers having soft gasketed spring-loaded closures.

(iv) Cleanup rags saturated with solvent other than acetone shall be stored, transported, and disposed of in containers that are closed tightly.

(v) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent other than acetone into the air.

(vi) The overspray shall be minimized by spraying as close as practical into the molds.

(vii) The application equipment operators shall be instructed and trained on the methods and practices utilized to minimize the overspray emitted on the floor and into the air filters.

(viii) All solvent other than acetone sprayed during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(ix) Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.

(b) Air-assisted airless spray means technology used to apply coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.2.8 Reporting Requirements

That a log of information necessary to document compliance with condition no. D.2.2 shall be maintained. These records shall be kept for at least the past 36-month period and made available upon request to the Office of Air Management (OAM).

(a) A quarterly summary shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within 30 days after the end of the quarter being reported in the format attached. These records shall include the coating, thinner and clean up solvent usage, material safety data sheet (MSDS) and the date of use.

(b) Unless otherwise specified in this permit, any notice, report, or other submissions required by this permit shall be timely if:

(i) Delivered by U.S. mail and postmarked on or before the date it is due; or

(ii) Delivered by any other method if it is received and stamped by IDEM, OAM on or before the date it is due.

(c) All instances of deviations from any requirements of this permit must be clearly identified in such reports.

(d) Any corrective actions taken as a result of an exceedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions must be clearly identified in such reports.

(e) The first report shall cover the period commencing the postmarked submission date of the Affidavit of Construction.